

1 BARRY J. PORTMAN
2 Federal Public Defender
3 NED SMOCK
4 Assistant Federal Public Defender
5 555 - 12th Street
6 Suite 650
7 Oakland, CA 94607-3627
8 Telephone: (510) 637-3500

9 Counsel for Defendant HILLYER

10

11

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA
14
15
16
17
18
19
20
21
22
23
24
25
26

UNITED STATES OF AMERICA,)	No. CR-09-0982 PJH
vs.)	DECLARATION OF NED SMOCK AND
RANNI HILLYER,)	[PROPOSED] ORDER TO MODIFY
Defendant.)	TRAVEL RESTRICTION

I, Ned Smock, declare the following:

1. Ranni Hillyer first appeared before this court on October 21, 2009. Counsel for Ms. Hillyer at that appearance did not provide the Court with information about Ms. Hillyer's need to travel for work. As a result, the Court imposed a travel restriction limiting Ms. Hillyer's travel to the Northern and Southern Districts of California.
2. Ms. Hillyer is an employee of Aero Financial, a consulting and private equity firm. Her position requires her to travel frequently to visit both investors and companies managed under Aero. Without the ability to travel, Ms. Hillyer will be unable to fulfill the expectations and needs of her employer.
3. Accordingly, I am asking that Ms. Hillyer's conditions of pretrial release be

1 amended to allow travel within the continental United States so long as she provides
2 at least 24 hour notice and travel details to her United States Pretrial Services
3 Officer and receives prior approval from that officer.

4 4. The Pretrial Services officer, Paul Mamaril, has no objection to this request. I have
5 also spoken with the assigned Assistant United States Attorney, Cynthia Stier, about
6 the request. She informs me that she does not object to the modification.

7 I declare that the foregoing is true to the best of my information and belief.

8

9 Dated: December 1, 2009

/S/
10 NED SMOCK
11 Assistant Federal Public Defender

12

[PROPOSED] ORDER

13 Good cause appearing therefore, it is the ORDER of this Court that the conditions
14 of release for Ranni Hillyer are modified to allow her to travel within the continental
15 United States provided that she gives at least 24 hour notice and travel details to her
16 assigned United States Pretrial Officer and receives prior approval from the officer.
17

18

Dated: December __, 2009

19 HON. TIMOTHY J. BOMMER
20 United States Magistrate Judge
21
22
23
24
25
26